

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

In re: )  
 )  
MATADOR PROCESSORS, LLC, ) Case No. 13-15303  
 ) (Chapter 11)  
Debtor. )

**DEBTOR'S APPLICATION TO SHORTEN TIME TO RESPOND TO AMENDED  
MOTION TO SELL PERSONAL PROPERTY FREE AND CLEAR OF LIENS,  
WITH BRIEF COMBINED**

The Debtor, by counsel, requests that the Court reduce time to respond to Debtor's *Amended Motion to Sell Personal Property Free and Clear of Liens, With Brief Combined, And Notice of Opportunity for Hearing* ("Motion") [Doc. No. 205] pursuant to Fed. R. Bankr. P. 9006, and 2002(a)(2), and Local Rule 9006-1. In support, Debtor shows this Honorable Court:

- 1 Debtor filed its Chapter 11 voluntary petition herein on December 2, 2013. Its Second Amended Plan was confirmed on March 9, 2015.
- 2 For cause, liquidation of personal property assets must occur within 81 days of confirmation (unless otherwise agreed,) pursuant to the Confirmation Order. Time is of the essence.
- 3 Debtor wishes to shorten time to object to its Motion. Debtor asserts in good faith that the purchase offer is excellent and will be beneficial to the estate. Buyer is prepared to close on May 4, 2015, at 3:00 p.m. o'clock CST.
- 4 Since filing the Motion, Debtor's counsel has twice attempted to contact all counsel appearing in the case, and the Office of the Asst. U. S. Trustee, by email, to determine whether there is any objection to shortening time. No response has

been received from any counsel voicing any objection. Based upon previous requests made by Debtor's counsel there are normally no objections to shortening time.

- 5 Expediting the Motion will facilitate the goal of timely liquidation.
- 6 No previous request for reduction of time concerning this Motion has been made.
- 7 Debtor requests notice time to object to the Motion be shortened from the date of entry of the Order, requiring all responses to be served on Debtor's counsel no later than Monday, May 4, 2015, at 12:00 p.m. CST.
- 8 A proposed order granting the requested relief is attached hereto and uploaded herewith.

WHEREFORE, Debtor prays for the Court to grant this Application to reduce the time to no later than Monday, May 4, 2015, at 12:00 p.m. CST.

Respectfully submitted,

/s/ B David Sisson

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ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> Day of April, 2015, a true and correct copy of the foregoing document was electronically served using the CM/ECF system, namely:

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/s/ B David Sisson